

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 1:19-cr-00334
)	
vs.)	
)	
JINGYUAN LI,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR CONTINUANCE

Comes now the Defendant, Jingyuan Li, by and through counsel, and respectfully moves the Court to continue the sentencing in this matter for approximately 45 days. In support of this motion, the Defendant states the following:

1. The Defendant pleaded guilty on March 18, 2021, to Count 3 of his indictment. Sentencing is currently set for July 13, 2021 at 9:30 a.m.
2. The presentence investigation report [PSR] has been completed in this matter and provided to counsel for the United States and counsel for the Defendant. The report is 19 pages long and written entirely in English.
3. Mr. Li speaks only Mandarin and does not speak English and all communications with him require the services of an interpreter.
4. Counsel needs additional time to review the PSR with Mr. Li, in order to ensure that the information is communicated to him in his language and that he is given adequate time to discuss the contents of the report with his counsel.
5. Counsel Elon Berk is physically located in Los Angeles, California and requires additional time to make himself available to meet with Mr Li in order to review the PSR thoroughly.
6. Counsel for the defendant wants to ensure that any and all issues that Mr. Li has are adequately addressed well in advance of the sentencing hearing.

7. The government, through AUSA Peters, has informed counsel that they do not object to a continuance of the sentencing hearing for 45 days.
8. The interests of justice will be served by allowing an additional 45 days for counsel to review the PSR with the defendant and to prepare for the sentencing hearing. This delay will not prejudice the United States, or any other interested parties.

Wherefore, the Counsel for the Defendant requests that the Court continue the currently set sentencing date for no less than 45 days to give counsel adequate time to prepare.

Respectfully submitted, via ECF, this 30th day of June 2021.

By Counsel:

s/Douglas A. Ramseur
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of June, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record.

s/Douglas A. Ramsey

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